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CAVIAR CREATOR, INC., a Nevada corporation

**UNITED STATES DISTRICT COURT**  
**EASTERN DISTRICT OF CALIFORNIA**

DANIEL W. FAERFERS and KATJA FAERFERS,	)	Case No.: 2:04-cv-2690 MCE PAN
	)	
Plaintiffs,	)	
	)	
v.	)	<b>STIPULATION AND ORDER TO</b>
	)	<b>CONTINUE DISCOVERY</b>
	)	<b>COMPLETION DATE</b>
CAVIAR CREATOR, INC., a Nevada corporation, individually and as successor to n Oregon corporation; CAVIAR CREATOR, INC., a Nevada corporation,	)	
	)	
Defendants.	)	

WHEREAS, pursuant to the Court's scheduling Order dated September 20, 2005, all  
all discovery, with the exception of expert discovery, shall be completed by January 13,  
2006 in the above-referenced action;

WHEREAS many of the parties and third-party witnesses reside outside the United  
States, including in Germany;

WHEREAS, the parties have been diligently proceeding with discovery;

WHEREAS the depositions of parties and witnesses have taken longer than initially  
expected because of language translation issues;

WHEREAS the parties hereto have stipulated that the currently scheduled date for  
completion of discovery should be continued to allow additional time for parties, witnesses,

1 and/or counsel to travel to/from Germany as necessary in this case;

2       THEREFORE, IT IS HEREBY STIPULATED by and between the parties hereto  
3 through their respective attorneys of record; Vaughan & Associates, Cris C. Vaughan, for  
4 Plaintiffs/cross-defendants Daniel W. Faerfers and Katja Faerfers; Boutin, Dentino, *et al.*,  
5 James P. Kirkley, for defendant/cross-claimant Sinclair Wilson; and Diepenbrock Harrison,  
6 Eileen M. Diepenbrock for Defendant/counterclaimant/cross-claimant Caviar Creator, Inc.,  
7 that the currently scheduled discovery completion date of January 13, 2006, be continued to  
8 April 15, 2006. To the extent this extension requires other modifications to the Court's  
9 September 20, 2005, Scheduling Order, the parties have no objection thereto.

10       SO STIPULATED.

11 DATED: December 21, 2005

DIEPENBROCK HARRISON

12  
13 By:

\_\_\_\_\_  
/s/

14 Eileen M. Depenbrock  
15 Attorneys for Caviar Creator, Inc.

16 DATED: December 21, 2005

BOUTIN, DENTINO, ET., AL

17 By:

\_\_\_\_\_  
/s/

18 James P. Kirkley  
19 Attorneys for Sinclair Wilson

20  
21 DATED: December 20, 2005

VAUGHAN & ASSOCIATES

22 By:

\_\_\_\_\_  
s/s

23 Cris C. Vaughan  
24 Attorneys for Plaintiffs DANIEL  
25 FAERFERS and KATJA FAEFERS

26 Original Signatures maintained by  
27 Diepenbrock Harrison  
28

**ORDER**


PURSUANT TO STIPULATION, the currently scheduled discovery completion date of January 13, 2006, is hereby continued to April 15, 2006.

Other modifications to the Court's September 20, 2005 Scheduling Order are as follows:

Deadline/Hearing	Current Dates (vacated)	New Dates
Jury Trial	10/25/06 at 09:00 a.m.	01/24/07 at 9:00 a.m.
Final Pretrial Conference	08/28/06 at 02:30 p.m.	12/18/06 at 01:30 p.m.
Dispositive Motion Hearing Deadline	06/12/06	09/11/06
Designation of Expert Witnesses deadline	03/13/06	06/15/06
Discovery completion deadline	01/13/06	04/15/06

**IT IS SO ORDERED.**

DATED: January 6, 2006

  
MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE